

U. S. ENVIRONMENTAL PROTECTION AGENCY  
REGION IV, ATHENS, GEORGIA

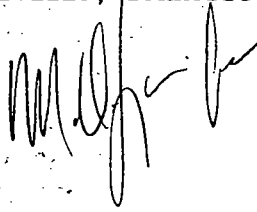
Site:	Carrier
Break:	4
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MEMORANDUM

DATE: **NOV 15 1989**

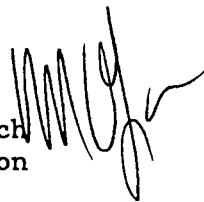
SUBJECT: Comments on RI/FS Work Plan and Sampling Plan, Revision B, for the Carrier Corporation Site, Collierville, Tennessee; ESD Project No. 90E-072

FROM: Donald Hunter, Hydrogeologist  
Hazardous Waste Section  
Environmental Compliance Branch  
Environmental Services Division



TO: Felicia Barnett, RPM  
North Site Management Section  
Superfund Branch  
Waste Management Division

THRU: M. D. Lair, Chief  
Hazardous Waste Section  
Environmental Compliance Branch  
Environmental Services Division



The subject documents have been reviewed as requested. Most sections of these documents received only a cursory review. The field effort-related sections, however, were thoroughly reviewed. Based on this review, I have the following comments. The comments are referenced to the page and section number of the material being commented on, are grouped by document, and are sequentially numbered for future reference.

WORK PLAN

Comment  
Number

Comment

1

p.43/Sec. 3.3.8, Decontamination - The document references and incorporates the Region IV SOP/QA manual for decontamination procedures. For future reference, the recommended solvent for normal situations is pesticide grade isopropanol. The document also indicates that Carrier plans to drastically modify the decontamination procedures once site-specific contaminants of concern are identified. ESD recommends that those procedures included in the Region IV SOP/QA be used for all field-cleaning.

SAMPLING PLAN (Note: Most all of the material in the Sampling Plan, upon which the following comments are based, is also included in the Work Plan. These comments apply to the sampling and well installation sections of both documents.)



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- 2 p.20/Sampling Objectives - The referenced codistillation process analytical procedure to be used in the TCE soil screening effort does have a fairly low method detection limit (MDL) for most media being analyzed. The MDL for soil, 800 ppb, is generally one to two orders of magnitude higher than the other media documented, but should be adequate for use in the proposed investigation. The comparison of the screening data against the results of analyses of splits sent to the laboratory should be carefully evaluated.
- 3 p.40/Sec. 4.1, Soil Samples - There is very little detail in this section regarding sample handling and preparation after retrieval from the split-spoon. Carrier should provide more information.
- 4 p.45/Sec. 4.1.2, Decontamination Procedures - Steps 6 and 7, listed at the top of the page, are inappropriate. After the solvent rinse step, the equipment should either be rinsed with organic-free water or allowed to fully air-dry.  
  
There is also a reference to changing rinsing solutions. No solutions used for field cleaning should be re-used. Each rinsate generated for individual equipment rinses should be collected and disposed of properly.
- 5 p.47/Sec. 4.2, Ground Water Samples - What exactly is meant by a Teflon-lined bailer?
- 6 p.53/Fig. 8, Suggested Monitoring Well Schematic - ESD would prefer that all stainless steel be used in the portion of the monitoring well which is in contact with the water column (reasonably considering expected historical high water tables). Appropriately cleaned galvanized riser above this interval would be acceptable.
- 7 p.55/Sec. 4.8, Health and Safety - ESD would like to review the Health and Safety Plan when submitted.

Please call at FTS 250-3351 if you have any questions regarding these comments.

cc: Finger/Patton  
Lair/Bokey  
Knight